

November 30, 2005

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Ex Parte Notice

Re: Implementation of Section 304 of the Telecommunications Act of 1996:
Commercial Availability of Navigation Devices, CS Dkt. No. 97-80

Dear Ms. Dortch:

On November 29, 2005, representatives of Comcast Corporation ("Comcast"), as well as representatives of several other cable operators, cable technology suppliers, the National Cable & Telecommunications Association, and a consumer electronics manufacturer, met with representatives of the Media Bureau, the Office of Engineering and Technology, and the office of Commissioner Copps to review the progress that has been made in the development of downloadable conditional access systems ("DCAS") since the technology demonstration that was reported in a letter for the record dated July 18.

In the previous demonstration, three companies, each using its own differentiated headend equipment, successfully demonstrated their ability to download their respective conditional access systems over a cable system to set-top boxes that had no embedded security and to download entitlement management messages that enable customers to access individually-authorized levels of service. The July 18 report also stated that additional work was in progress to enable conditional access systems to be downloaded to a variety of set-top boxes and to consumer electronics products.

The demonstration on November 29 highlighted successes resulting from that endeavor. Specifically, Scientific-Atlanta, Inc. and Motorola, Inc. both demonstrated their ability to use DCAS to enable consumers to receive, on set-top boxes that had no embedded security, encrypted content delivered over systems using each others' differentiated headend equipment (and unique security systems), as well as their own. Thus, a Scientific-Atlanta set-top box using DCAS was able to operate on a Motorola network; a Motorola set-top box using DCAS was able to operate on a Scientific-Atlanta network; and both were able to easily move between the Motorola and Scientific-Atlanta networks. In addition, NDS Americas, Inc. and Samsung Electronics Co., Ltd. demonstrated the download of NDS's conditional access and entitlement messages to a retail Samsung set-top box using DCAS, illustrating the suitability of DCAS for the retail environment.

Lead presenters in the meeting included Mark Coblitz, Senior Vice President of Strategic Planning for Comcast; Dave Fellows, Executive Vice President and Chief Technology Officer, Comcast Cable; Tony Wasilewski, Chief Scientist, Subscriber Networks Center, Scientific-Atlanta, Inc.; Geoff Roman, Corporate Vice President and Director of Strategy and Business Development, Motorola, Inc.; Kevin Leddy, Senior Vice President, Strategy and Development, Time Warner Cable; Stan Sands, Vice President of Corporate Sales for NDS Americas, Inc.; Noh-Byung Park, Executive Vice President and Chief Technical Officer, R&D Center, Digital Media Network Business, Samsung Electronics Co., Ltd.; Chong-ho Choi, Vice President, Strategy and Business Development, R&D Center, Digital Media Network Business, Samsung Electronics Co., Ltd. The FCC representatives who attended the presentation are shown below in the list of "cc's."

This letter is filed in accordance with Section 1.1206(b)(2) of the Commission's rules. Please let me know if you have any questions.

Respectfully submitted,

/s/

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